

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CHARLENE JANSON

*

Plaintiff

*

v.

* Case No: 1:19-cv-00079-DKC

REITHOFFER SHOWS, INC.

*

Defendant

*

ANSWER PRESENTING DEFENSES

Reithoffer Shows, Inc., Defendant, by KARPINSKI, COLARESI & KARP and DANIEL KARP, its attorneys, responds to the complaint as follows:

RULE 12(b) DEFENSES

1. The complaint fails to state a claim upon which relief may be granted.

ANSWER

2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1.
3. Defendant admits that its principal place of business is in Florida.
4. Paragraph 3 does not contain any allegations of fact which Defendant must either admit or deny.
5. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4.
6. Defendant admits the allegations contained in paragraph 5.

7. Defendant denies the allegations contained in paragraph 6.
8. Defendant denies the allegations contained in paragraph 7.
9. Defendant denies the allegations contained in paragraph 8.
10. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9.
11. Defendant denies the allegations contained in paragraph 10.
12. Defendant denies the allegations contained in paragraph 11.
13. Defendant denies the allegations contained in paragraph 12.
14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13.
15. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14.
16. In response to the second paragraph 11, Defendant adopts and incorporates by references its responses to the previous paragraphs.
17. Defendant denies the allegations contained in the second paragraph 12.
18. Defendant denies the allegations contained in the second paragraph 13.

AFFIRMATIVE DEFENSES

19. Plaintiff assumed the risk.
20. Plaintiff was contributorily negligent.
21. Plaintiff's claims are barred by the applicable statutes of limitations.
22. The damages which can be recovered are limited by law.

KARPINSKI, COLARESI & KARP

BY:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of February, 2019, a copy of the foregoing Answer Presenting Defenses was electronically filed, with notice to:

Deborah L. Potter, Esquire
Suzanne V. Burnett, Esquire
Potter Burnett Law
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Of Counsel for Defendant